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7 Attorney for Bailey Aaron Hall

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 BAILEY AARON HALL,

15 Defendant.
16

Case No. 2:16-cr-321-JAD-PAL

STIPULATION TO MOTION
DEADLINES
(Third Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
18 United States Attorney, and Alexandra Michael, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Brian
20 Pugh, Assistant Federal Public Defender, counsel for Bailey Aaron Hall, that the Motion
21 deadline scheduled for April 14, 2017, be vacated and that the parties herein shall have to and
22 including April 28, 2017, to file any and all pretrial motions and notices of defense.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
24 shall have to and including May 12, 2017, to file any and all responsive pleadings.

25 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
26 shall have to and including May 19, 2017, to file any and all replies to dispositive motions.

1 The Stipulation is entered into for the following reasons:

2 1. The parties are engaged in plea negotiations which would obviate the need to
3 file Motions.

4 2. The defendant is incarcerated and does not object to the continuance.

5 3. The parties agree to the continuance.

6 4. The additional time requested herein is not sought for purposes of delay, but
7 merely to allow counsel for defendant sufficient time within which to be able to effectively and
8 complete research and file their pretrial motions.

9 5. Additionally, denial of this request for continuance could result in a miscarriage
10 of justice. The additional time requested by this Stipulation is excusable in computing the time
11 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
12 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
13 Section 3161(h)(7)(B)(i), (iv).

14 This is the third stipulation to continue filed herein.

15 DATED this 14th day of April, 2017.

16 RENE L. VALLADARES
17 Federal Public Defender

18 */s/ Brian Pugh*
19 By _____

20 BRIAN PUGH
Assistant Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

/s/ Alexandra Michael
By _____

ALEXANDRA MICHAEL
Assistant United States Attorney

1 **CONCLUSIONS OF LAW**

2 The ends of justice served by granting said continuance outweigh the best interest of the
3 public and the defendant in a speedy trial, since the failure to grant said continuance would be
4 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the
5 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into
6 account the exercise of due diligence.

7 The continuance sought herein is excusable under the Speedy Trial Act, Title 18, United
8 States Code, Section § 3161 (h)(7)(A), when the considering the factors under Title 18, United
9 States Code, § 3161(h)(7)(B)(i), (iv).


10 **ORDER**

11 IT IS FURTHER STIPULATED AND AGREED, that the parties herein shall have to
12 and including April 28, 2017, to file any and all pretrial motions and notices of defense.

13 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
14 shall have to and including May 12, 2017, to file any and all responsive pleadings.

15 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
16 shall have to and including May 19, 2017, to file any and all replies to dispositive motions.

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21 DATED this 17th day of April, 2017.

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23 
24 _____
25 UNITED STATES DISTRICT JUDGE
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